## UNITED STATES DISTRICT COURT WESTERN DISTRICT OF LOUISIANA LAFAYETTE DIVISION

Document 20

LOINT MOTION TO CTAN DOOF	VEDINGC DENIDING MEDIATION
Defendant	
INDEPENDENT SPECIALTY INSURANCE COMPANY	Magistrate Judge Carol D. Whitehurst
Plaintiff v.	Judge James D. Cain, Jr.
S.K.A.V., LLC	Civil Action 6:21-CV-04345-JDC-CBW

## JOINT MOTION TO STAY PROCEEDINGS PENDING MEDIATION

Defendant Independent Specialty Insurance and Plaintiff SKAV, LLC by and through undersigned counsel, file this Unopposed Motion to Stay Proceedings pending the completion of mediation, stating as follows:

- 1. In this insurance dispute, SKAV, LLC seeks funds pursuant to its insurance policy.
- 2. On December 17, 2021 SKAV, LLC filed a Complaint for Declaratory Judgment and Damages against Defendant in this Honorable Court seeking damages allegedly related to Hurricane Laura.
- 3. Defendant filed a Motion to Compel Arbitration and Stay Proceedings Pending Arbitration (the "Motion to Compel") on March 2, 2023.
  - 4. Plaintiff has filed an Opposition.
  - 5. Defendant intends to file a Reply Memorandum.
  - 6. The parties have conferred and scheduled mediation of this matter on June 12, 2023.
- 7. In the interest of judicial economy, the parties respectfully request that the Court stay this matter, including any decision on the pending Motion to Compel until June 19, 2023 to

allow for mediation. A draft Order is being submitted with this Motion.

- 8. The stay described will expire and be lifted on June 19, 2023.
- The pre-trial deadlines and trial date contained in this Court's scheduling order (R. 9.

Doc. 9) are not altered unless the Motion to Compel is granted or appealed. .

WHEREFORE, the Parties respectfully request that the Court enter an Order staying this matter until after conclusion of mediation, or on June 19, 2023.

Respectfully submitted,

WOOD, SMITH, HENNING & BERMAN LLP

/s/ Lori D. Barker

Lori D. Barker #31687

lbarker@wshblaw.com

Laci N. Hamilton #36771

lhamilton@wshblaw.com

1100 Poydras Street, Suite 2900

New Orleans, Louisiana 70163

Telephone: (504) 386-9840

Facsimile: (504) 386-9841

Counsel for Defendant, Independent Specialty Insurance

Company

**KEVIN R. SLOAN**, #34093

kevin@gmhatlaw.com

Gauthier Murphy & Houghtaling, LLC

3500 North Hullen St.

Metairie, LA 70002

(504) 456-8600

(504) 456-8624 (facsimile)

Counsel for Plaintiff